

AFFIDAVIT

I, Wade Cochran, being first duly sworn, hereby depose and state as follows:

1. I am a Task Force Officer with the Federal Bureau of Investigation ("FBI") and have been since November 20, 2019. In such capacity, I am authorized to investigate violations of the United States Code under Title 18 and Title 21, to include applying for search and arrest warrants. I am employed by the Montpelier Police Department, and am currently assigned to the Detective Division. I was previously assigned to the Vermont Drug Task Force for over five years, from December 2013 to January 2019, and have been a Full Time Law Enforcement Officer since 2004. I have authored numerous affidavits in support of search and arrest warrants and participated in hundreds of criminal investigations, many of which involved violations of state and federal controlled substance and firearm laws.

2. This affidavit is submitted to establish probable cause to believe that, on or about June 4, 2020, the defendant Maurice FLANAGAN knowingly and intentionally possessed with intent to distribute heroin, a Schedule I controlled substance, in violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C).

3. I am familiar with the facts and circumstances of this investigation based on my personal participation in this case, my training and experience, my discussion with other law enforcement agents, my discussions with witnesses involved in the investigation, and my review of records relating to the investigation.

4. Because this affidavit is being submitted for the limited purpose of establishing probable cause, I have not included details of every aspect of my investigation, nor have I included all the details of other investigations known to me.

PROBABLE CAUSE

5. On June 2, 2020, law enforcement observed a BMW SUV at the residence of Adam Saldi in Montpelier, Vermont. Based on a check of DMV and Enterprise Rental Car records, I learned that the defendant Maurice FLANAGAN had rented the BMW SUV in Connecticut and that he had it rented until June 7, 2020.

6. In addition, on June 2, 2020, I observed the BMW SUV parked at the Hilltop Inn in Berlin, Vermont. An inquiry with the Hilltop Inn that day revealed that FLANGAN had rented a room there until June 15, 2020.

7. On June 3, 2020, the Honorable John M. Conroy, United States Magistrate Judge, issued search warrants for Saldi's residence and his vehicle.

8. On June 4, 2020, a law enforcement surveillance team observed Saldi's vehicle on Barre Street in Montpelier, Vermont. At approximately 7 a.m., Sergeant Kevin Moulton of the Montpelier Police Department stopped Saldi's vehicle on Main Street. Saldi, who was driving the vehicle, had an active state warrant for violation of his probation terms. As noted above, there was also a federal search warrant authorizing the search of Saldi's vehicle at that time.

9. Sergeant Moulton placed Saldi in custody for the probation violation and transported Saldi to the Montpelier Police Department. I met and spoke with Saldi at the Montpelier Police Department. I briefly explained to Saldi, in sum and substance, that law enforcement knew he was dealing drugs and that he was part of a larger investigation. Saldi, spontaneously uttered, in sum and substance, that if you are watching my house, you know about the deals. Thereafter, at approximately 7:32 a.m., I read Saldi his *Miranda* rights from an FBI advice-of-rights form. Saldi signed a written waiver of his *Miranda* rights. In sum and substance, Saldi stated as follows: Saldi had met a male from Connecticut through a mutual

associate in Vermont and Saldi obtained heroin but not cocaine base from the Connecticut male on June 2, 2020. Saldi further stated that the Connecticut male goes by, "Mo." I showed Saldi a photograph of the defendant Maurice FLANAGAN and Saldi positively identified the male in the photograph as "Mo." Saldi added that he purchased heroin directly from "Mo," in particular a couple of "buns"¹ of heroin. Saldi told me that he paid \$80 per "bundle" and handed the money directly to "Mo" for the heroin. Saldi further explained that he calls "Mo" by telephone and "Mo" comes and delivers the drugs. Saldi noted his belief that Mo does not keep drugs on him otherwise.

10. I further asked Saldi, in sum and substance, what law enforcement can expect to find in Saldi's house. Saldi responded, in sum and substance, that you are going to find marijuana. A search of Saldi's residence pursuant to the above-referenced search warrant revealed, among other items, approximately a pound of marijuana. I additionally informed Saldi, in sum and substance, that law enforcement has a search warrant for his vehicle and I asked him what law enforcement can expect to find there. Saldi, in sum and substance, responded that law enforcement would find a couple of "bundles" of heroin and some crack. A search of Saldi's vehicle pursuant to the above-referenced warrant revealed, among other items, approximately 72 bags of heroin, one of which field-tested positive for the presence heroin. There were also four pieces of apparent cocaine base in Saldi's vehicle.

11. On June 4, 2020, Detective Sergeant Karl Gardner and Detective Trooper Brandon Degre, both of the Vermont Drug Task Force, observed the above-referenced BMW SUV that FLANAGAN had rented parked at the Hilltop Inn in Berlin, Vermont. They observed

¹ Based on my training and experience, I understand a "bun" or "bundle" to refer to ten bags of heroin.

the BMW SUV leave the Hilltop Inn at approximately 9:15 a.m., and later observed the BMW SUV at a grocery store on Route 302 in Berlin, Vermont. Detective Sergeant Karl Gardner and Detective Trooper Brandon Degre then maintained surveillance of the vehicle. From having viewed a photograph of FLANAGAN, Detective Trooper Degre observed a male that he identified as Maurice FLANAGAN approach and enter the BMW SUV. Sergeant Moulton, in a marked Montpelier Police Department Vehicle, stopped the BMW SUV. Law enforcement detained FLANAGAN, who was driving the BMW SUV, and a female, who was in the passenger seat. FLANAGAN, in sum and substance, asked Detective Sergeant Gardner what this was about. Detective Sergeant Gardner replied, in sum and substance, that law enforcement is investigating him in connection with a search warrant that was executed that morning. FLANAGAN replied, in sum and substance, I was there yesterday, but not for drugs.

12. Also on June 4, 2020, Officer Karie Tucker of the Northfield Police Department arrived at the scene of the stopped BMW SUV. Officer Tucker recognized FLANAGAN and the female passenger from having pulled over a different vehicle in Northfield, Vermont that FLANAGAN had been driving, and in which the female was a passenger, on May 23, 2020. At that previous stop, Officer Tucker learned FLANAGAN's identity from FLANAGAN's Connecticut driver's license. Based on a check of DMV and Enterprise Rental Car records, Officer Tucker had learned that FLANAGAN had rented that prior vehicle from Connecticut on May 14, 2020, and that it was due to be returned on May 24, 2020.

13. After arriving at the scene of the stopped BMW SUV, Officer Tucker approached the female passenger, who initially informed Officer Tucker that her name was Danesa Diaz, with a date of birth of March 26, 1988. However, when Officer Tucker asked her for further biographical information and the female had difficulty answering, the female stated, in sum and

substance, that she would tell the truth and that her name is Saskia Rosario, with a date of birth of May 25, 1983.

14. Both FLANAGAN and Rosario were detained and transported to the Montpelier Police Department. Law enforcement commenced a search of the BMW SUV. In a purse located on the floor of the front passenger seat, where Rosario had been seated, law enforcement found, among other items: approximately ten unstamped wax bags containing powder consistent with heroin, one of which field-tested positive for the presence of heroin; two packages of Suboxone lingual strips; a glass pipe with brown residue that appeared consistent with a “crack pipe”; a baggie with a residue of white powder; bank cards in Rosario’s name; and an apparent hotel key card with handwriting indicating Room 244 (but no listed hotel).

15. In the course of the search of the BMW SUV, law enforcement also located a receipt, dated May 15, 2020, for a room at the Hilltop Inn in Berlin, Vermont showing the guest as Maurice FLANAGAN of 58 Skyview Terrace, Manchester, CT renting Room 244 beginning on February 19, 2020 to May 20, 2020 and an amount due of approximately \$5,914.16 (with tax), a credit of \$279.04, a cash payment of \$5,635.12, and an amount tendered of \$300 cash or check. Law enforcement also found in the BMW SUV an Alamo rental car receipt in Maurice FLANAGAN’s name, which indicated that FLANAGAN rented a vehicle in Connecticut on May 14, 2020 for return on May 21, 2020. Law enforcement additionally found a cellular telephone in the center console, and a black fanny pack on the driver side door. Inside of the fanny pack, law enforcement encountered \$562.00 in United States currency, two cellular phones, a key fob, and a Philips-head screwdriver. Law enforcement opened the locked glove box of the BMW SUV and found approximately 80 stamped wax bags of apparent heroin, one of

which field-tested positive for the presence of heroin. The stamp on those wax bags matched the stamp found on an empty wax bag recovered in the search of Saldi's residence.

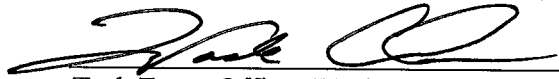
16. On June 4, 2020, a search of Flanagan's person revealed his wallet, which contained approximately \$1,032.00 in United States currency; a search of Saskia's person led to the recovery of the key to the glovebox of the BMW SUV as well as two empty wax paper bags, the stamp on which matched the stamp from the wax bags recovered from the BMW SUV and the wax bag recovered from Saldi's residence.

17. Law enforcement also interviewed Rosario on June 4, 2020. They informed Rosario of her *Miranda* rights and presented her with both a *Miranda* waiver form and a waiver of speedy presentment form, both of which Rosario signed. In sum and substance, Rosario stated that when law enforcement stopped the BMW SUV earlier that day, FLANAGAN gave her the key to the glovebox. Rosario also indicated that FLANAGAN had provided her with heroin.

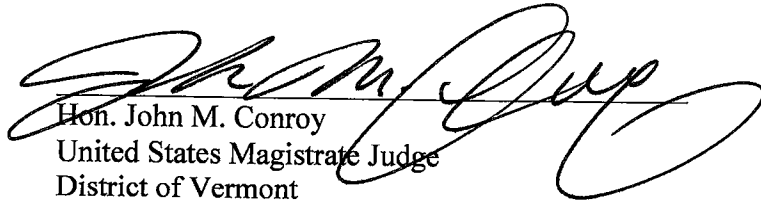
CONCLUSION

18. Based on the foregoing, I submit there is probable cause to believe that on or about June 4, 2020, Maurice FLANAGAN violated 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C) by knowingly and intentionally possessing with intent to distribute heroin, a Schedule I controlled substance.

Respectfully submitted,


Task Force Officer Wade Cochran
Federal Bureau of Investigation

Subscribed and sworn to before me on June 5, 2020.


Hon. John M. Conroy
United States Magistrate Judge
District of Vermont